

Planning Policy  
East Devon District Council  
Blackdown House  
Border Road  
Honiton  
Devon  
EX14 1EJ

23<sup>rd</sup> January 2026

Dear Madam or Sir,

**East Devon Heritage Strategy Consultation  
DCC Historic Environment Team Comments**

The Devon County Historic Environment Team welcomes the revised East Devon Heritage Strategy and the opportunity to comment.

The strategy may benefit from an early definition of terms. It is a Heritage Strategy, but refers to Historic Environment in Theme A. The document could include definitions of *Heritage, Historic Environment, Built Historic Environment, Archaeology, Historic Landscape, Cultural Landscape*.

**1.2: What is heritage.** Include historic landscape, as most landscapes aren't 'natural'. Could include museums and collections – though these are referred to with other partners later in the document.

**1.3:** Could include figures for all heritage assets, as recorded by the Devon Historic Environment Record (HER).

**1.4:** The National Landscapes are also recognised for their cultural landscape value (ie. Historic Landscape, built heritage, archaeology) and the East Devon NL and the Blackdown Hills NL contain some of East Devon's most important and distinctive historic landscapes and heritage assets. The ED NL also includes the East Devon Heritage Coast, which is a non-statutory designation, but still current – and for which EDDC has responsibility. Heritage Coasts are recognised for their natural beauty, wildlife and heritage and amongst the purposes of definition is support for these qualities and enabling enjoyment of them by the public.

The Jurassic Coast WHS overlaps with the ED NL and the Heritage Coast – and contains many heritage assets linked to past human exploitation of the internationally significant geology.

**1.51:** Should also mention the Levelling Up & Regeneration Act 2023 (see 1.69-1.70 below).

**1.56:** “HER” rather than “HERS”

**1.56 to 1.59:** Section on DCC/CHET role needs some attention. We suggest:

1.56: The County Council maintains the Devon Historic Environment Record (HER) as a public record and on behalf of Devon’s local planning authorities. The HER contains information about designated, locally listed and other undesignated heritage assets, including archaeological sites, historic buildings, landscapes and findspots, from the Palaeolithic (Old Stone Age) to the mid-20<sup>th</sup> Century.

1.57: The HER holds source material such as historic tithe and Ordnance Survey maps, RAF aerial photos from the 1940’s, other archaeological aerial and ground photographs, published and unpublished material, available to view in person or online (<https://www.devon.gov.uk/historicenvironment/the-devon-historic-environment-record/>).

1.58: The HER contains links to reports and studies, such as Historic Landscape Character Mapping, revealing the evolution of East Devon’s field patterns through the ages. Also, the Devon Historic Market & Coastal Towns Survey, which includes Exmouth, Honiton and Seaton.

1.59: The HER contains the results of systematic archaeological analysis and interpretation of aerial surveys, including conventional aerial photography from the 1930s to the present day, and recent remote sensed data (LiDAR – Light Detection and Range) revealing a wealth of evidence on the history of East Devon. These Aerial Investigation & Mapping Projects, funded by Historic England, have covered the South Devon Coast (including East Devon), the Blackdown Hills, and East and Mid Devon River Catchments.

Suggested new paragraph:

- Information held in the HER underpins the County Historic Environment Teams role in advising East Devon District Council on spatial planning and development management casework, and the County Council as the minerals and waste planning authority and highway authority. Also advising statutory undertakers for pipeline and cabling operations (such as water, gas and electricity companies), and conservation bodies, farmers and land managers for national and local environmental stewardship schemes, tree-planting, and biodiversity habitat enhancement initiatives.

Also, should mention DCC as Highways Authority: Responsible for maintaining heritage assets such as historic bridges, milestones, traditional waymarkers, and its role in managing the public realm in East Devon’s historic towns/villages.

**1.64:** The Jurassic Coast Trust does not exist anymore. The World Heritage Site is now managed directly by Dorset Council and Devon County Council.

**1.65:** Local Societies should refer to the Devon Archaeological Society and its role in publishing the results of archaeological work in East Devon (Proceedings of the Devon Archaeological Society), also promoting understanding and access (guide leaflets to Hembury, Woodbury, Dumpdon), and ownership of Hembury Hillfort. Also, the Devonshire Association, with its publication and promotion of Devon’s architecture, culture, geology, natural history and archaeology.

It should also mention the Devon Gardens Trust (see sections on Historic Parks & Gardens).

**1.69 – 1.70: Legislative Framework.** – Should mention the Levelling Up & Regeneration Act 2023 e.g. Section 102 duty to have regard to conserving and enhancing the historic Environment. Section 230 duty to maintain or have access to a Historic Environment Record.

Need to look at proposed NPPF 2026 as well. Or at least update NPPF paras to the 2025 version.

**1.72:** Typo. Capitalisation of archaeology but not Scheduled Monuments.

## **Theme A**

**2.3 – 2.4:** could bring out more (in the existing text) on East Devon's prehistory. Significant finds of Stone Age handaxes from the river valley gravel terraces, particularly at Broom Quarry. Concentrations of Bronze Age Barrows at Farway and Brampford Speke. Very prominent Hillforts on the Greensand ridges, spurs and outliers of the Blackdowns – Hembury, Dumpdon, Musbury, Membury, Sidbury, Hawkesdon. Also, coastal and inland promontory forts or 'cliff castles' such as Berry Camp (Branscombe) and Seaton Down.

**2.4:** Could reference the significant contribution of deliberately planting of trees, and natural regeneration, within former mineral extraction pits (marl, clay, sand/gravel), to the now highly characteristic pattern of dispersed woodland of the Blackdown Hills and East Devon National Landscapes.

**2.4 or 2.5:** could mention the impact of Roman interest in the region's minerals. Evidence for extensive opencast iron mining on the Blackdown Hills, and of iron smelting on the Blackdowns and into the lower land to the south. Probable iron industry link to the stunning Seaton Down Hoard of nearly 23,000 Roman coins, one of the largest Roman coin hoards ever found in the UK. Also start of mining/quarrying of Beer Stone in the Roman period (later use mentioned in 2.8).

**2.6:** Axminster. Roman fort and roadside town to the south, with Saxon royal and ecclesiastical centre at the heart of the modern town. Link to Conservation Areas – town and village centres also likely to contain high archaeological potential as historic cores of most settlements, which will have at least medieval origins.

**2.7:** Also planned farms and influence on villages of the Rolle Estate in the Otter Valley.

**2.9:** Also, architectural mark of non-conformism, e.g. Methodist and Baptist chapels (e.g. Grade II\* Loughwood Chapel), Reading Rooms, Sunday Schools, and Quaker meeting houses.

**2.10:** Roadside features such as water pumps and troughs, Milestones and traditional finger posts/waymarkers.

**2.12:** Could mention the significance of the events that the World War Two sites reflect – Battle of Britain (RAF Exeter); Battle of the Atlantic (Dunkeswell); D-Day (RAF Upottery, and Dunkeswell, training structures on the Pebblebed Heaths). The period of the plan will

also see the 100<sup>th</sup> anniversary of the construction of the still visible anti-invasion defences along the coast, and the inland 'Taunton Stop-Line', as well as the Battle of Britain.

**2.20 - 2.30: Conservation Areas** – should also reference their high archaeological potential as they include the historic cores of most settlements (towns and villages), which will have at least medieval origins.

**2.33 – 2.35: Parks & Gardens** – Should mention the Devon Gardens Trust here (and or link to the section on local organisations). Through the national Historic Gardens Trust, they are a statutory consultee (currently) on planning proposals affecting all Registered Historic Parks & Gardens. Also hold research/information on Devon's P&Gs and maintain a Local List of P&Gs.

**2.36 – 2.38: Archaeological heritage** – Would benefit from rewording. It should describe what form the archaeological heritage takes – earthworks, ruined buildings and structures, artefact scatters, individual findspots, below ground archaeological features and deposits (sometimes manifesting as archaeological cropmarks), as well as ancient field patterns and ancient environmental evidence preserved in waterlogged conditions. This heritage ranges from the Palaeolithic (Old Stone Age) to the Cold War of the 20<sup>th</sup> Century – including the early prehistoric features referenced in 2.36 and 2.37, but also significant Romano-British, medieval and post-medieval heritage, as well as modern industrial and military archaeology. This heritage is found across East Devon's towns and villages, as well as in the countryside and on the coast.

**2.38 – 2.39: Scheduled Monuments** – formally designated or protected as Scheduled Monuments, rather than 'recorded as'.

**2.39:** SM statistics. I think that the 6 castles and 6 forts referred to, include several hillforts, or prehistoric enclosures, that have 'Castle' or 'Fort' in their name – such as Hembury Fort (Iron Age hillfort), Stockland Great and Little Castles (Iron Age hillfort and enclosure) and Farway Castle (Bronze Age enclosure). There is one Roman fort (Woodbury at Axminster) and one medieval motte and bailey castle (Kilminster). There are at least two Roman Villas (Uplyme and Membury), with a possible third at Seaton (which may be a 'Mansio' or official Roman post station).

**2.40:** Barrows are late Neolithic to middle Bronze Age. Mid third to mid second millennium BC (Roughly 2500 – 1500 BC). Can't think of any later Bronze Age examples in Devon.

**2.42:** Seaton may be a Roman official post station, or 'Mansio' rather than a villa. Worth mentioning that there is a Roman Fort at Woodbury (Axminster) as well as a Romano-British roadside settlement. Also, evidence of Roman military use inside the Scheduled hillfort at Hembury.

**2.43:** (see also comments under 2.39 above) Better not to count them as 'castles' in 2.39, but reasonable to clarify that they are hillforts. There is one genuine, Scheduled, medieval motte and bailey castle at Castle Hill, Kilminster, and the moated (ditched defences) manor site at Cowley.

**2.44:** Worth mentioning here or elsewhere that the Killerton Park SMs are multi-period, including Dolbury Iron Age hillfort and the 18<sup>th</sup> century deerpark pale (ditch and bank to keep the deer in).

**2.46:** Beer stone was first exploited in the Roman period (e.g. decorative stonework at Holcombe Roman villa).

**2.48:** Could add that, as yet, ED does not have any sites designated as Registered Historic Battlefields, but the battlefield sites of the Western Rising (or Prayerbook Rebellion) of 1549, at Fenny Meadow, Woodbury and Clyst St. Mary, relate to historic events of national importance and arguably merit consideration for designation.

**2.49:** Should refer to the Devon Gardens Trust Local List of Parks and Gardens. This has recently been updated, so the statistics need to be checked – there are now 31, including Poltimore Park and Stedcombe House.

**2.50:** Establishing and managing a list of undesigned assets??

**2.54: ED NL** - Could say that the ED heathland contains the rich heritage of prehistoric funerary and ceremonial monuments, previously mentioned. Should also mention that the ED NL also includes the East Devon Heritage Coast, which is a non-statutory designation, but still current – and for which EDDC has responsibility. Heritage Coasts are recognised for their natural beauty, wildlife and heritage and amongst the purposes of definition is support for these qualities and enabling enjoyment of them by the public.

**2.55: Blackdowns NL** - Could mention the prominent Iron Age hillforts, such as Hembury and Dumpdon. Also, the mining and quarrying heritage – iron, whetstones, clay, and agricultural marl that has left a significant legacy through deliberate planting and natural regeneration of woodland over former extraction sites.

**2.56:** Would really benefit from saying that potential Green Infrastructure often is/are heritage assets: green lanes, disused railway lines, field systems/patterns, parks and gardens, churchyards and cemeteries, orchards, former quarries, etc.

**Theme A Summary:** We welcome the Objectives and Actions in the Theme A Summary.

**2.65 – 2.66:** Should mention working in partnership with Devon County Council regarding access to a Historic Environment Record (an NPPF and Levelling Up & Regeneration Act requirement) and provision of archaeological planning advice. Currently, in two-tier authority areas, it is normal for the HER and archaeological advice to be provided at County level.

**2.76:** maybe re-word as:

- In addition to this, the Local Plan allocates development sites. Site assessments are undertaken as part of the allocation process to ensure that, in principle, development will not harm the district's most important significant heritage assets or their setting. In some cases, where an appropriate level of archaeological information is obtained through undertaking an archaeological assessment prior to development taking place, development may actually enable better revealing of an asset or better public understanding or access to it. Where sites are allocated development will still need to accord with the policies of the Local Plan and where a planning permission is required any such application may still need to be supported by a heritage assessment. Further archaeological and/or historic building recording, in mitigation for the development's impact, may be required through planning conditions applied to any consent granted.

**2.76:** Although in part covered in the text of 2.76, relating to pre-assessment, there could also be more emphasis on the public benefit that can arise from archaeological or historic building conditions (NPPF 218: Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost

(wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible).

**2.78 – 2.80: Listed Building Consent** – Could add that, as with planning applications, applicants for LBC will need to submit sufficient information for a decision to be made. This may include assessment of the history and historic fabric of the Listed building or structure as well as details of the proposed works. Also, that conditions may be applied regarding recording of any archaeological and historic building interest. Could also refer to the Statutory Consultees – Historic England and the amenity societies (e.g. Victorian Society).

**2.86 – 2.87:** ‘Preservation in situ is considered to be the most appropriate means to ensure protection [of heritage assets]’ applies to designated and undesignated archaeological and built heritage assets. So, it applies to 2.86 and 2.87.

**2.86 – 2.87:** Should mention that Historic England is also a Statutory Consultee on planning applications affecting Scheduled Monuments.

**2.88:** Should include a reference to the Gardens Trust as a Statutory consultee for all RPGs. And Historic England for Grade I and II\* RPGs. Should also refer to the setting of an RPG. Designed landscape views may be of particular importance.

**2.90:** - maybe re-word as:

- A feature of local interest can take the form of a building that that retains its historic form and external detail and makes a positive contribution to the architectural and historic character of the locality for one or more criteria, such as age, rarity, historic association or aesthetic value. This also applies to parks and gardens of high local importance, and to significant archaeological sites, such as flint scatters, historic field systems and settlement sites that may be visible above ground, or may only survive below ground, such as sites recorded as archaeological cropmarks.

**2.89 – 2.92: Local List of undesignated heritage assets** – It is very important that this section, and the online guidance, makes clear that the Local List is not exclusive/exhaustive. There will be many more undesignated heritage assets, such as those recorded on the Historic Environment Record, that are also protected by national planning policy and by Local Plan policies. The Local List is a dynamic subset of these that have been identified as being of particular importance to the community. The Local List is likely to grow as the public, parish and town councils, and amenity groups become aware of the Local List and how to enhance it.

**2.92:** This should refer to consideration of historic landscapes, such as parks and gardens, and archaeological sites in the local list, not just built structures

**2.92: Proposed Action** – We recommend adoption of the Devon Gardens Trust Local List of Parks & Gardens of Historic Interest as part of the East Devon Local List.

**2.93:** Agricultural (and forestry) activity are significant contributors (is referred to in 2.96 for SMS – which are also Heritage Assets).

**2.102:** I think this section needs to be double-checked. My understanding is that volunteer warden training hasn't, unfortunately, been followed up. Partly because of lack of access to private land. Historic England report that work on conserving Heritage @ Risk in the

[www.devon.gov.uk](http://www.devon.gov.uk)

NLs has been through Historic England's Monument Management Scheme (MMS) – which has involved work with Devon County Council, the Blackdown Hills National Landscape and local volunteers at Dunkeswell Abbey (which is referred to in 2.167 – where the NL did run the Discovering Dunkeswell Abbey project at the same time as the HE/DCC MMS project), and with DCC and the Pebblebed Heaths Trust and RSPB on Bronze Age barrows on the heaths. Historic England, Natural England, landowners, DCC, National Trust and other partners are using environmental stewardship and landscape recovery schemes to address heritage @ risk. In the past (quite a few years ago) DCC worked with HE, the ED AONB (as was) and the SW Coast path Partnership to address heritage @ risk on the Coast path (e.g. High Peak and Berry Camp). The NLs do run or support events, such as East Devon Heath Week, which has a heritage component, and the Blackdowns NL has a heritage festival I think. I'm not sure that either NL has any active heritage projects at the moment. Both NLs operate a Farming in Protected Landscapes scheme, which can involve heritage conservation, interpretation and access (e.g. the Blackdowns NL have provided valuable support to the Devon Archaeological Society at Hembury Hillfort).

**2.103 – 2.114: Managing Conservation Areas** – Should refer to the statutory duty that various bodies (Highways Authority, utility companies) have under - S72 of the 1990 Act - '*special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area*'.

**2.120 – 2.121: Local Material** – Could refer to the Devon Strategic Stone Study (Devon County Council/British Geological Society).

**2.122: Development in Rural Areas** – also likely to encounter archaeology within or adjacent to existing, usually historic, farmsteads. Many farms, even if not outwardly ancient, will have originated in the medieval or post-medieval eras. Un-listed farm houses and farm buildings will often contain historic fabric concealed within them.

**2.115 – 2.121: Proposed Actions and Theme B Summary** – Could include action to work with DCC as Mineral Planning Authority to identify and permit sustainable sources of local building stone.

**2.132: Heritage & tourism** – not just the traditional buildings. The historic landscape that makes the National Landscapes and wider ED landscape, and accessible archaeological monuments on public access land (the Pebblebed Heaths), on the PROW network and long-distance trails (ED Way, SW Coast Path) also contribute to the attraction for tourists and staycationing residents alike.

**2.136 - onwards: Environmental benefits** – working with the historic environment should be an important part of Local Nature Recovery (see Natural England Guidance - *Nature recovery and the historic environment* (2023)) and will be one of the wider benefits of the forthcoming Devon Local Nature Recovery Strategy. Tree planting – for climate and biodiversity, can work with heritage, to restore historic landscapes (e.g. historic parks and gardens), restore traditional orchards, enhance the setting of Listed Buildings, while avoiding un-necessary harm to archaeological sites.

**2.170 and 2.174: Neighbourhood Plans** – DCC Historic Environment Team also actively support Neighbourhood Plan groups, providing HER information, guidance, and commenting on draft plans. DCC HET is updating its Neighbourhood plan guidance on its web pages.

**2.198: Historic Town Centres** – Exmouth, Honiton and Seaton have had Historic England/DCC historic character surveys as part of the Devon Historic Market & Coastal Towns Survey.

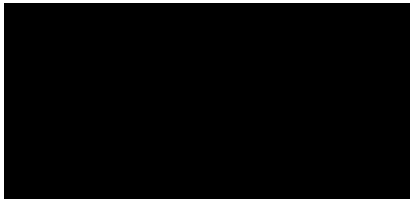
**2.206: Sources of Funding – DEFRA** – Should also include environmental stewardship schemes, nature recovery schemes and woodland grants, that can all have a heritage component. DEFRA’s Farming in Protected Landscapes funding – for National Landscapes, also including heritage options for archaeology and historic buildings/structures, looks set to continue for a few more years.

**Action Plan:** DCC HE Team, principally because of the Historic Environment Record, should be included as a partner in sections: Widen knowledge; Celebrate and Promote; Local List.

**Appendix 3: Partners etc.** – Partners should include the Pebblebed Heaths Trust (Clinton Devon Estates). The Jurassic Coast Trust no longer exist – consider replacing with Dorset Council. Local History Organisation should include Devon Archaeological Society and Devonshire Association. Also, the South-West Airfields Heritage Trust, and the Poltimore House Trust. The Devon Gardens Trust gazetteer is now their Local List.

I will be happy to discuss any of these comments further with you.

Yours faithfully,



Devon County Archaeologist & Historic Environment Manager

